

# Exhibit D

**Morrell, Benjamin S.**

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**From:** Ahmed, Nasir <NAhmed@taftlaw.com>  
**Sent:** Wednesday, June 4, 2025 1:09 PM  
**To:** david.johnson@butlersnow.com; john.dollarhide@butlersnow.com;  
sharron.couch@butlersnow.com; willcoxbldings@pm.me  
**Cc:** Pasternak, Thomas; Morrell, Benjamin S.; Wellhausen, Elizabeth  
**Subject:** FW: Weather King v. Maupin, et al. – Notice of Deposition of Douglas Southard  
**Attachments:** American Barn Co.'s Notice of Deposition Douglas Southard.pdf

Good Afternoon,

Please find attached the Notice of Deposition of Douglas Southard, for June 26, 2025 at 9:00 am (CST). The deposition is to be taken at the office of Butler Snow, LLP at the following address: 1320 Adams Street, Suite 1400, Nashville, Tennessee 37208.

## Nasir Ahmed

Attorney

Taft/

Sherman  
& Howard

2555 E. Camelback Road  
Suite 1050, Phoenix, AZ 85016

Direct: 602.240.3014 | Office: 602.240.3000 | Email: NAhmed@taftlaw.com

**Sherman & Howard  
has joined Taft.**

**Effective January 1, 2025. Learn more here.**

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**From:** Ahmed, Nasir  
**Sent:** Wednesday, June 4, 2025 11:07 AM  
**To:** david.johnson@butlersnow.com; john.dollarhide@butlersnow.com; sharron.couch@butlersnow.com;  
willcovxbldings@pm.me  
**Cc:** Pasternak, Thomas <tpasternak@taftlaw.com>; Morrell, Benjamin S. <bmorrell@taftlaw.com>; Wellhausen, Elizabeth <ewellhausen@taftlaw.com>  
**Subject:** Weather King v. Maupin, et al. – Notice of Deposition of Douglas Southard

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**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

CONSOLIDATED INDUSTRIES, LLC d/b/a  
WEATHER KING PORTABLE  
BUILDINGS,

Plaintiff,

v.

JESSE A. MAUPIN, BARRY D. HARRELL,  
ADRIAN S. HARROD, LOGAN C. FEAGIN,  
STEPHANIE L. GILLESPIE, RYAN E.  
BROWN, DANIEL J. HERSHBERGER,  
BRIAN L. LASSEN, ALEYNA LASSEN,  
and AMERICAN BARN CO., LLC,

Defendants.

Civil Action No. 1:22-cv-01230-STA-

jay

District Judge Anderson

Magistrate Judge York

**NOTICE OF DEPOSITION**

**PLEASE TAKE NOTICE THAT** Defendants will take the deposition of **Douglas Southard**, on **June 26, 2025 at 9:00 am (CST)**, at the office of Butler Snow, LLP located at 1320 Adams Street, Suite 1400, Nashville, Tennessee 37208. The deposition will be taken before a notary public, or other person authorized under law to administer oaths with respect to evidence and material necessary to the prosecution and defense of this action. The deposition will be stenographically and videographically recorded, and will continue until completed.

Date: June 4, 2025

By: /s/ Thomas G. Pasternak

Thomas G. Pasternak (admitted pro hac vice)

Benjamin S. Morrell (TBPR No. 35480)

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[bmorrell@taftlaw.com](mailto:bmorrell@taftlaw.com)

*Counsel for Defendants Maupin, Harrell,  
Harrod, Feagin, Gillespie, Brown,  
Hershberger, and American Barn Co., LLC*

**CERTIFICATE OF SERVICE**

I certify that on the date listed below, a true and correct copy of the foregoing document was served upon the following individuals and counsel via email and U.S. Mail, First-Class, postage prepaid:

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Date: June 4, 2025

By: /s/ Thomas G. Pasternak  
Thomas G. Pasternak